Exhibit 1

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

PLAYERS' CONCUSSION INJURY	:	No. 2:12-md-02323-AE
LITIGATION	· :	MDL No. 2323
	:	
	:	Hon. Anita B. Brody
THIS DOCUMENT RELATES TO:	:	
	:	
ALL ACTIONS	:	
	•	

DECLARATION OF ORRAN L. BROWN, SR.

I, ORRAN L. BROWN, SR., hereby declare and state as follows:

- 1. My name is Orran L. Brown, Sr. I am the Chairman and a founding partner of BrownGreer PLC ("BrownGreer"), located at 250 Rocketts Way, Richmond, Virginia 23231.
- 2. I am over the age of 21. The matters set forth in this Declaration are based upon my personal knowledge and information.
- 3. I submit this Declaration to describe an Opt Out revocation request that BrownGreer, as the Claims Administrator under the Class Action Settlement Agreement in this action ("Settlement Agreement"), received on January 12, 2016.
- 4. In its April 22, 2015 Final Approval Order and Judgment, the Court directed the Claims Administrator to post a list of Opt Outs as of that date. Accordingly, we posted on the official Settlement website a list of the 175 Opt Outs that were timely and included all elements required for a valid Opt Out under Section 14.2(a) of the Settlement Agreement (the "Opt Out List"), and a list of the 33 Opt Outs that were untimely and/or were missing one or more of Section 14.2(a)'s required elements. Section 14.2(c) of the Settlement Agreement

provides that a Class Member who had opted out but wished to revoke that Opt Out could submit a written request to do so "[p]rior to the Final Approval Date."

- 5. After the April 22, 2015 Final Approval Date, eight Class Members included on the Opt Out List as timely and complete submitted requests to revoke those Opt Outs. The Parties to the Settlement Agreement agreed to accept those revocation requests, subject to Court approval. The Parties and I reported the requests to the Court. By Orders of July 15, 2015 (Document 6642) and December 22, 2015 (Document 6713), the Court approved the revocation requests. As a result, we no longer counted those persons as Opt Outs and on each occasion posted on the Settlement website a revised Opt Out List identifying the remaining timely and complete Opt Outs remaining after the Court's Order, which totaled 167 after the second Order.
- 6. On January 12, 2016, I received from Counsel for the NFL Parties a letter from Mr. Roy Green, a copy of which (with personal information redacted) is attached as Attachment 1 to this Declaration.
- 7. Mr. Green had submitted an Opt Out that was timely and complete. In his letter, Mr. Green requests that he be permitted to revoke this Opt Out.
- 8. The Parties to the Settlement Agreement have informed me that they agree to accept this revocation request, subject to Court approval.
- 9. If the Court grants its approval, we will remove this Opt Out from the list of timely complete Opt Outs and, upon direction of the Court, will post a revised Opt Out List identifying the remaining 166 timely and complete Opt Outs.

I, Orran L. Brown, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed on this 14th day of January, 2016.

Orran L. Brown, Sr.

Christopher Seeger Co-Lead Class Counsel SEEGER WEISS, LLP 77 Water Street New York, NY 10005

Sol Weiss Co-Lead Class Counsel ANAPOL SCHWARTZ 1710 Spruce Street Philadelphia, PA 19103

Brad Karp Counsel for the NFL Parties Paul, Weiss, Rifkind, Wharton & Garrison, LLP 1285 Avenue of the Americas New York, NY 10019

Re: REVOCATION OF OPT OUT FROM SETTLEMENT CLASS

Dear Counsel:

Please take notice that I, Roy Green, wish to revoke my request to be excluded from the Settlement Class in *In re: National Football League Players' Concussion Injury Litigation*, No. 2:12-md-02323.

Name:		ŀ	Roy Green	
Addres	s:			
Phone	No.:			
Date of	f Birth:	,		
Signature:	4	y.		
Print Name:	Rog	GRE	EN	
Date:	JAN	12	2016	